

 CHAMBERLAIN, HRDLICKA, WHITE, WILLIAMS & AUGHTRY, P.C.  
ATTORNEYS AT LAW

KELLEN R. SCOTT  
SHAREHOLDER  
DIRECT: 713.356.1767  
KELLEN.SCOTT@CHAMBERLAINLAW.COM

1200 SMITH STREET, SUITE 1400  
HOUSTON, TEXAS 77002  
713.658.1818 800.342.5829  
FAX: 713.658.2553

HOUSTON  
ATLANTA  
PHILADELPHIA  
SAN ANTONIO

October 22, 2020

**Via Electronic Filing**

Honorable United States Magistrate Judge Andrew M. Edison  
United States Courthouse  
601 Rosenberg  
Galveston, Texas 77550

Re: No. 3:20-CV-00090; *H. Stuart Campbell, Jr. v. Texas Tea Reclamation, LLC*  
In the United States District Court, Southern District of Texas, Galveston Division

Dear Judge Edison:

Judge Brown has referred all dispositive pretrial matters in this case to you for report and recommendation. [Doc. 28]. In that regard, and consistent with Rule 6 of your Court Procedures, Plaintiff H. Stuart Campbell, Jr. requests a pre-motion conference on his forthcoming motion for summary judgment as to liability on his claims for breach of contract.

Campbell and Defendant Texas Tea Reclamation, LLC have conferred about the absence of any genuine dispute concerning Texas Tea's liability on the twenty-eight promissory notes that form the basis of Campbell's contract claims. Moreover, Texas Tea's counsel previously acknowledged to this Court during a September 1, 2020 pre-motion conference that Texas Tea does not dispute much of Campbell's breach of contract claims. This is consistent with Texas Tea's pleadings and discovery responses in the case. Texas Tea contests the amount of money it owes Campbell on the notes.

To reduce the parties' expenses and avoid the motion entirely, Campbell conferred with Texas Tea several times and asked it to stipulate to its liability for breach of the notes. Texas Tea did not agree to do so. Therefore, a motion is necessary. Campbell's motion will promote judicial efficiency and economy and streamline and reduce the remaining issues in the case that are truly in dispute. Campbell requests permission to file his Rule 56 motion or, in the alternative, a pre-motion conference if the Court deems a conference necessary.

Thank you for your attention to this important matter.

Very truly yours,



Kellen R. Scott

KRS: